

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
ILLINOIS

ART ASK AGENCY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:20-cv-04518
)	
UUMM, et al.)	
)	
Defendants.)	Hon. John J Tharp, Jr.

UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE PLEAD

COMES NOW Defendant UUMM, by and through counsel, and pursuant to Federal Rule of Civil Procedure 6(b) respectfully moves this Court for an extension of time to answer or otherwise plead, showing the Court as follows:

1. Plaintiff filed its Complaint on August 3, 2020. [ECF No. 1]
2. The Court's docket indicates that responsive pleadings were due September 15, 2020.
[ECF No. 25]
3. Plaintiff filed a motion for default on November 12, 2020. [ECF No. 37]
4. As of December 4, 2020, Plaintiff's motion for default has not yet been granted.
5. The undersigned counsel was retained early on the morning of December 4, 2020. She immediately contacted Michael Hierl, counsel for Plaintiff, via email and requested an extension of time to answer or otherwise plead to permit the parties a period of time to explore the possibility of settlement. Attorney Hierl responded and indicated that he had no objection.
6. There is no intention by Defendant in filing this motion for extension to negatively

affect the entry of default against any other non-moving Defendants in this case. The relief sought in this motion is limited to Defendant UUMM alone.

7. Defendant respectfully requests that the Court enter an Order granting this motion and extending the deadline for it to answer or otherwise plead through December 18, 2020, to permit the parties to determine whether settlement is possible, or whether UUMM will file a responsive pleading by that date.
8. This extension of time is not being sought for the purpose of delay or frustration of the progress of this matter.
9. This extension will not unduly burden Plaintiff.

WHEREFORE, Defendant UUMM respectfully requests that this Court grant its Unopposed Motion for Extension of Time to Answer or Otherwise Plead and Ordering Defendant UUMM to answer or otherwise plead by December **18**, 2020.

Respectfully submitted,

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CERTIFICATE OF
SERVICE

This is to certify that on December 4, 2020, this document was filed with the Court via the CM/ECF electronic filing system, thereby serving it upon all counsel of record.

/s/ Erin K. Russell